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April 30, 2007

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: CC Docket No. 02-33 - Notice of Discontinuance of PVC-Based Wholesale DSL Transport Service

Dear Ms. Dortch:

Pursuant to the Commission's Wireline Broadband Order,¹ BellSouth Telecommunications Inc., doing business as AT&T Alabama, AT&T Florida, AT&T Georgia, AT&T Kentucky, AT&T Louisiana, AT&T Mississippi, AT&T North Carolina, AT&T South Carolina, AT&T Tennessee and hereafter referred to collectively as "AT&T Southeast," hereby notifies the Commission that effective June 1, 2007, AT&T Southeast will no longer offer PVC-based wholesale DSL transport service to third party Internet Service Providers (ISPs) / Network Service Providers (NSPs) and will discontinue its tariff for that service. This service change affects all of AT&T Southeast's service areas in the franchised territories including Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee. AT&T Southeast intends, however, to continue to offer a session-based service on a non-common carrier basis to third party ISPs / NSPs. Any PVC-based DSL circuits that are not migrated to a session-based service by June 1, 2007, will be disconnected.

Since the release of the Wireline Broadband Internet Access Order, AT&T Southeast has taken steps to advise third party ISPs / NSPs of its intent to discontinue PVC-based DSL service. Beginning October 31, 2005, AT&T Southeast posted on its website² Bulletin No. 282 announcing the release of the Commission's Order and notifying third-party ISPs / NSPs that its PVC-based DSL service would be discontinued effective November 16, 2006. A series of bulletins followed, which reminded third party ISPs / NSPs of AT&T Southeast's plans for the November 16, 2006, deadline for PVC-based DSL service discontinuance as documented below:

¹ *Appropriate Framework for Broadband Access to the Internet over Wireline Facilities Universal Service Obligations of Broadband Providers*, Report and Order and Notice of Proposed Rulemaking, CC Docket No. 02-33, 20 FCC Rcd 14853, ¶ 101 (2005) (*Wireline Broadband Order*).

² AT&T Southeast posted notices on its website that is commonly used by customers of this service to view notifications of changes in service offerings.

- Nov 4, 2005 - Bulletin No. 283 reminds third party ISPs / NSPs of the November 16, 2006, deadline for PVC-based DSL service discontinuance
- Mar 28, 2006 - Bulletin No. 294 reminds third party ISPs / NSPs of the November 16, 2006, deadline for PVC-based DSL service discontinuance.
- April 4, 2006 - Bulletin No. 295 reminds third party ISPs / NSPs of the November 16, 2006, deadline for PVC-based DSL service discontinuance.
- April 20, 2006 - Bulletin No. 299 reminds third party ISPs / NSPs of the November 16, 2006, deadline for PVC-based DSL service discontinuance.
- April 21, 2006 - Bulletin No. 301 reminds third party ISPs / NSPs of the November 16, 2006, deadline for PVC-based DSL service discontinuance and notifies customers of no new PVC end users.
- May 17, 2006 - Bulletin No. 305 reminds third party ISPs / NSPs of the November 16, 2006, deadline for PVC-based DSL service discontinuance.
- August 25, 2006 - Bulletin No. 310 reminds third party ISPs / NSPs of the November 16, 2006, deadline for PVC-based DSL service discontinuance.

On October 23, 2006, AT&T Southeast posted Bulletin No. 313, which announced a suspension until further notice of the November 16, 2006, PVC disconnection deadline. AT&T Southeast posted Bulletin No. 320 on February 2, 2007, which notified third party ISPs / NSPs of the new May 31, 2007, deadline for PVC-based DSL service discontinuance. Additional notices of the new May 31, 2007, deadline were posted March 8, 2007 (Bulletin No. 322) and April 2, 2007 (Bulletin No. 326). Copies of the bulletins are attached hereto as Attachments 1-12.

A copy of this letter has been submitted to the public utility commission and the governor in each of the nine southeastern states in which these services will be discontinued. In addition, a copy of this letter has been provided to the Special Assistant for Telecommunications for the Secretary of Defense.

If you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

/s/ Terri L. Hoskins
Terri L. Hoskins

CERTIFICATE OF SERVICE

I, Lacreteria Hill, do certify that I have, on this 30th day of April 2007, served a copy of the foregoing Notice of Discontinuance of PVC-Based Wholesale DSL Transport Service to the following:

Honorable Bob Riley
Governor State of Alabama
State Capitol
600 Dexter Avenue
Montgomery, Alabama 36130

Alabama Public Service Commission
P.O. Box 304260
100 North Union Street, Suite 850
Montgomery, Alabama 36130

Governor Charlie Crist
Plaza Level 05, The Capitol
400 South Monroe Street
Tallahassee, Florida 32399-0001

Lisa Polak Edgar, Chairman
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Governor Sonny Perdue
State of Georgia
203 State Capitol
Atlanta, Georgia 30334

Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334

Governor Ernie Fletcher
Office of the Governor
Suite 100
700 Capital Avenue
Frankfort, Kentucky 40601

Elizabeth O'Donnell, Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, Kentucky 40602-0615

Governor Kathleen Babineaux Blanco
P.O. Box 94004
Baton Rouge, LA 70804-9004

Lawrence C. St. Blanc
Executive Secretary
Louisiana Public Service Commission
Galvez Building, 12th Floor
602 North Fifth Street, P.O. Box 91154
Baton Rouge, Louisiana 70821-9154

Governor Haley Barbour
P.O. Box 139
Jackson, Mississippi 39205

Mississippi Public Service Commission
P.O. Box 1174
Jackson, Mississippi 39215

Governor Michael F. Easley
Office of the Governor
20301 Mail Service Center
Raleigh, North Carolina 27699-0301

Edward S. Finley, Jr., Chairman
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4325

Governor Mark Sanford
Office of the Governor
P.O. Box 12267
Columbia, South Carolina 29211

Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

Governor Phil Bredesen
Governor's Office
Tennessee State Capitol
Nashville, TN 37243-0001

Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Secretary of Defense
Attn: Special Assistant for Telecommunications
Pentagon
Washington, DC 20301

/s/ Loretta Hill
Loretta Hill

ATTACHMENTS 1-12

0283: PVC to BBG Conversion Information

November 4, 2005

In BellSouth DSL Bulletin #282, BellSouth announced how the wholesale DSL business would be supported after November 16, 2005. Information was provided regarding the impact to PVC based services. Network service providers will be able to add new end user locations for the PVC based services beginning November 16, 2005 under Generally Available Terms and Conditions until May 17, 2006. All PVC based services will be discontinued effective November 16, 2006. BellSouth encourages network service providers to begin migration of their PVC based customers to the Broadband Gateway (BBG) platform - aka End User Aggregation (EUA). This bulletin is intended to give an overview of what steps are required and what changes will need to be made in order to implement such a move.

What is Broadband Gateway (BBG)?

Broadband Gateway is an architecture based on delivering end user locations to the Network Service Provider (NSP) as PPP sessions over L2TP. The NSP establishes a connection to BellSouth and L2TP tunnels are provisioned between BellSouth and the NSP over an ATM-based connection. This service has been available since 2001. You may also hear the service referred to as End User Aggregation (EUA). For all intents and purposes, the 2 terms are synonymous with each other.

How do I connect to the BBG?

An NSP has 2 options to connect to the BBG architecture. First, the NSP can install a dedicated point to point connection between them and the serving BBG switch via the Dedicated BBG product. This type of connection will serve only BBG-based DSL and nothing else (for example, no ATM PVC's of any kind). The connection is still ATM-based with an IP connection provisioned over the ATM PVC. Finally, the L2TP tunnels are established over that connection.

Second, the NSP can utilize an existing ATM circuit and have the IP connection and L2TP tunnels mapped via an ATM PVC over the ATM network to their connection via the Shared ATM/BBG product. This type connection requires an existing FCC ATM connection to the BellSouth network (DS1, DS3, OC3, or OC12).

Please contact your BellSouth Sales Representative for more assistance on pricing and determining the best connection option for your company.

What host site equipment do I need to support BBG?

The NSP must have a router that supports the appropriate speed of their connection (for example: DS1, DS3, OC2, ATM protocols), and be able to terminate L2TP tunnels. Additionally, the router must be able to terminate and authenticate PPP sessions. If an NSP is not presently using PPPoA/E and/or authenticating their end users, the NSP may need to add RADIUS (or some equivalent means of authentication) to their existing network configuration. Also, depending on the LATA in which the NSP is connecting, the router used to support the L2TP tunnels may be required to terminate multiple L2TP tunnels from that LATA. Please contact your hardware vendor to ensure your selected hardware has the proper capabilities and

capacity to support these requirements.

Do I need to have 2 connections to the BellSouth network to migrate?

Yes. As long as the NSP's base of users utilizes both PVC and BBG connections, then a logical connection must be maintained to both the ATM and BBG networks. It should be noted, however, that an NSP may elect to use the Shared ATM/BBG product on an existing ATM connection during the transition and then migrate their end users from the ATM architecture to the BBG architecture without the overhead of an additional physical circuit.

What changes do I need to make to my end user CPE?

The BBG architecture requires the end user to use PPPoE or PPPoA in order to establish a connection across the network. The BellSouth network will automatically detect whether PPPoE or PPPoA is being used. Additionally, the PPP login username for the CPE must be configured in the form of username@nspdomain.com where username is a valid login name for that end user at the NSP's router/point of authentication and nspdomain.com is a valid domain that was specified during the configuration of the BBG connections. Additionally, BellSouth testing has determined that some CPE does not work as well as others in this configuration and that testing is highly recommended. Please contact your CPE vendor to ensure that their CPE has been tested and is compliant with the BellSouth DSL network.

How do I move my end users from PVC's to BBG? What does it cost to do this?

Moving an NSP's end users is as simple as placing a speed change order for each end user in SOEG. There is no cost associated with this change.

If you have further questions, please contact your BellSouth Sales Representative.



V5 GATC

BELLSOUTH DSL BULLETIN #294

Date: March 28, 2006

Subject: Updated V5 GATC to be Posted 4/13/06

BellSouth is updating its Generally Available Terms and Conditions (GATC) to accommodate the transition of services customers have purchased from the Tariff to the GATC when BellSouth DSL is removed from the Company's Tariff F.C.C. No.1 November 15, 2006 as planned.

The V5 GATC will be available for viewing on BellSouth's website at the following URL on April 13, 2006: (<http://interconnection.bellsouth.com/dsl/>).

Customers who have submitted a signed Acknowledgement of Terms and Conditions form and who have services they purchased from the Tariff will have services they purchased from the Tariff transitioned to the GATC in the event BellSouth's Tariff is revised as planned and no further action by the customer is required.

Please contact your BellSouth Sales Representative if you have further questions concerning this transition.

For more information regarding this bulletin, please contact
your BellSouth Sales Representative.



SOEG Release 20 and Availability

BELLSOUTH DSL BULLETIN #295

Date: April 4, 2006

Subject: SOEG Release 20 Availability Schedule

SOEG R20 NSP Bulletin Information

The SOEG production server at (<http://adsl.bellsouth.com>) will be taken offline on Sunday, May 7, 2006 beginning at 12:00 AM ET (midnight) through 12:00 PM ET (noon) for planned R20 deployment.

Release 20 will be updated to the SOEG simulator at (<http://soegtest.bellsouth.com>) on Friday, 4/07 and will be available for testing at 8:00 AM on Saturday, 4/08.

Following are the features included the SOEG R20 Release:

XML Migration

SOEG R20 continues the migration to XML/SOAP based API services. Customers currently utilizing the legacy CORBA API and bulk application are encouraged to begin migrating to the SOEG SOFSRV API as soon as possible.

Starting with SOEG Release 20.0, the SOEG "Bulk" application and the CORBA API client will no longer be available for download via the SOEG web site. Customers needing access to these legacy tools should send an e-mail to SOEGSupport@BellSouth.com. Information on continued support for legacy CORBA interfaces into SOEG will be provided in future NSP Bulletins.

Provide TAR code in Pre-Qual (TN) Response:

SOEG will provide the taxing code for the end user TN in the pre-qual response. This is through the API only, not the GUI.

PVC Service Restriction:

As noted in previous Bulletins, effective May 17, 2006, no new PVC orders will be accepted although the embedded base of PVC will still remain in service until November 16, 2006. As of May 17, 2006, SOEG will deny new PVC orders and will return the following denial message:

<Speed Type> Is Not Available At This Time

In addition, term commitments on individual products will no longer be available. All products will be available with a month-to-month option **only**. However, all term contracts entered into prior to November 16, 2005, will be honored until expiration.

For more information regarding this bulletin, please contact your BellSouth account representative.

New Denial Message:

“Only Month-to-Month Is Allowed”

For more information regarding this bulletin, please contact
your BellSouth account representative.

PVC to BBG Conversion - Updated

BELLSOUTH DSL BULLETIN #299

Date: April 20, 2006

Subject: PVC to BBG Conversion Information - Updated

Note – This Bulletin supersedes Bulletin #283 (November 4, 2005). This new Bulletin changes the definition of Shared and Dedicated BBG/EUA access.

Additionally, Bulletin #300 (BBG Architecture Change – Updated) has been issued, which should be reviewed by Network Service Providers (NSPs) in conjunction with this Bulletin. (Bulletin #300 outlines a second logical connection to BBG. NSPs who have already made a connection to BBG should review Bulletin #300 to ensure compliance. This especially applies to those who have made their first connection to BBG in the past two months).

In BellSouth DSL Bulletin #282, BellSouth announced how the wholesale DSL business would be supported after November 16, 2005. Information was provided regarding the impact to PVC based services. NSPs will be able to add new end user subscribers for the PVC based services beginning November 16, 2005 under Generally Available Terms and Conditions until May 17, 2006. All PVC based services will be disconnected starting on November 16, 2006. BellSouth encourages NSPs to begin migration of their PVC based customers to the Broadband Gateway (BBG) platform - aka End User Aggregation (EUA). This bulletin is intended to give an overview of what steps are required and what changes will need to be made in order to implement such a move.

What is Broadband Gateway (BBG)?

Broadband Gateway is an architecture based on delivering end user locations to the Network Service Provider (NSP) as PPP sessions over L2TP. The NSP establishes a connection to BellSouth and L2TP tunnels are provisioned between BellSouth and the NSP over an ATM-based connection. This service has been available since 2001. You may also hear the service referred to as End User Aggregation (EUA). For all intents and purposes, the 2 terms are synonymous with each other.

How do I connect to the BBG?

BBG connections are made through an ATM termination. Two types of connections are possible, depending entirely upon the use of ATM services in that connection.

For more information regarding this bulletin, please contact
your BellSouth Sales Representative.

- Shared BBG/EUA Connection means that the connection to the BellSouth DSL network via BBG is shared with other ATM services on the same Transport circuit. Those ATM services can be any of the normal ATM services (eg Frame Relay), and/or use of the PVC-based DSL product (Direct PVC)
- Dedicated BBG/EUA Connection means that the connection to the BellSouth DSL network is used only for DSL session based traffic via BBG. No other ATM services are used or provisioned.

The BBG connection has an ATM PVC provisioned between the NSP and BellSouth, over which L2TP tunnels will be mapped for End-User subscriber traffic. The physical circuit can be a FCC ATM connection at DS1, DS3, OC3, or OC12 speeds. For Dedicated BBG connections, no ATM Port or UBR Activation charge will be required.

Please contact your BellSouth Sales Representative for more assistance on pricing and determining the best connection option for your company.

What host site equipment do I need to support BBG?

The NSP must have a router that supports the appropriate speed of their connection (for example: DS1, DS3, OC3, OC12 and ATM protocols), and be able to terminate L2TP tunnels. Additionally, the router must be able to terminate and authenticate PPP sessions. If an NSP is not presently using PPPoA/E and/or authenticating their end users, the NSP may need to add RADIUS (or some equivalent means of authentication) to their existing network configuration. Also, depending on the LATA in which the NSP is connecting, the router used to support the L2TP tunnels may be required to terminate multiple L2TP tunnels from that LATA. Please contact your hardware vendor to ensure your selected hardware has the proper capabilities and capacity to support these requirements.

Do I need to have 2 connections to the BellSouth network to migrate?

Yes. As long as the NSP's base of users utilizes both PVC and BBG connections, then a logical connection must be maintained to both the ATM and BBG networks. It should be noted, however, that an NSP may elect to use the Shared ATM/BBG product on an existing ATM connection during the transition and then migrate their end users from the ATM architecture to the BBG architecture without the overhead of an additional physical circuit.

What changes do I need to make to my end user CPE?

The BBG architecture requires the end user to use PPPoE or PPPoA in order to establish a connection across the network. The BellSouth network will automatically detect whether PPPoE or PPPoA is being used. Additionally, the PPP login username for the CPE must be configured in the form of username@nspdomain.com where username is a valid login name for that end user at the NSP's router/point of authentication and nspdomain.com is a valid domain that was specified during the configuration of the BBG connections. Additionally, BellSouth testing has determined that some CPE does not work as well as others in this configuration and that testing

your BellSouth



is highly recommended. Please contact your CPE vendor to ensure that their CPE has been tested and is compliant with the BellSouth DSL network.

How do I move my end users from PVC's to BBG? What does it cost to do this?

Moving an NSP's end users is accomplished by placing a speed change order for each end user in SOEG. There is no cost associated with this change.

If you have further questions, please contact your BellSouth Sales Representative.

your BellSouth



Reminder Alert: No New PVC End Users

BELLSOUTH DSL BULLETIN #301

Date: April 21, 2006

Subject: No New PVC End User Subscriber Orders after May 16, 2006

As a reminder; BellSouth previously announced in Bulletins #282, #284 & #285 the discontinuance of the PVC architecture. Below are the issues and timelines associated with these announcements.

No New PVC End User Subscriber Orders after May 16, 2006

The ability to add new end user subscribers for the PVC based services will be disabled as of May 17, 2006. The embedded base of PVC End-User Subscribers will be disconnected starting on November 16, 2006.

Moving from PVC to BBG/WBBG

BellSouth encourages network service providers who have signed an Acknowledgement of Terms (GATC) or a Commercial Agreement to begin migration of their PVC based customers to the Broadband Gateway (BBG/WBBG) platform - aka End User Aggregation (EUA). More information on this can be found in Bulletin #299 (PVC to BBG – Updated) and Bulletin #300 (BBG Architecture Change - Updated). Setup for BBG/WBBG can take up to 45 days. To ensure that you minimize any lapse in ability to add new end user subscribers, please follow the instruction in the referenced bulletins.

GATC and Commercial Agreements

Network service providers who have not signed an Acknowledgement of Terms (GATC) or a Commercial Agreement with BellSouth, must do so before they will be able to migrate customers from PVC to BBG. If you need to sign one of these documents or have any further questions, please contact your BellSouth Sales Representative.

Replies to this email address will not receive a response.

For more information regarding this bulletin, please contact your BellSouth Sales Representative.



Reminder – PVC Status and Promotions

BELLSOUTH DSL BULLETIN #305

Date: May 17, 2006

Subject: PVC Status and Promotions

REMINDER

No New PVC End User Subscriber Orders Accepted

The ability to add new End User Subscribers for the PVC based services architecture was disabled as of May 17, 2006. The embedded base of PVC End User Subscribers will be disconnected starting on November 16, 2006. See Bulletin #299, #300 and #301 for more information on moving to BBG/WBBG.

PROMOTIONS

BellSouth DSL “Connect for Less – Phase III”

Promotion Period – January 1, 2006 through June 30, 2006

During the promotion period, when an NSP orders Session Based DSL 1.5Mbps x 256Kbps as an upgrade from existing BellSouth DSL Service provided at 256Kbps x 128 Kbps. A service credit of four dollars (\$4.00) will be applied to the NSP's account for each of the next three (3) months or for each month the ordered service remains in place, if the ordered service is in place less than three (3) months. There is NO charge for upgrading service as a part of this promotion. In addition, the Service Effective Date (SED) does not change with this change in speed. All minimum purchase and length of service requirements still apply.

Service credits will appear on the NSP's invoice within three billing cycles following change of speed to the Session Based DSL service.

BellSouth DSL “PVC to EUA Service Conversion”

Promotion Period Extended through June 30, 2006

The original promotion was to end May 15, 2006 but has been extended to June 30, 2006. This promotion provides financial incentives when moving from PVC to EUA. For the details on this promotion and its requirements, see Bulletin #304.

For more information regarding this bulletin, please contact your BellSouth Sales Representative.

For more information regarding this bulletin, please contact
your BellSouth Sales Representative.





Call to Action - PVC DSL Disconnection

BELLSOUTH DSL BULLETIN #310

Date: August 25, 2006

Subject: PVC DSL Disconnection

Ignoring this Bulletin may cause loss of connection to subscribers!

PVC to be Disconnected Nov 16, 2006

The ability to add new End Users for the PVC based services architecture was disabled as of May 17, 2006. The embedded base of PVC End Users left in service on November 16, 2006 will be disconnected starting on Nov. 16. Below are 5 scenarios, at least one of which, and possibly more than one, will apply to you. Please find the one the best describes your situation so that you will understand what **work** you may still have to do.

1. You have End Users on PVC and you do not plan to convert your PVC to End User Aggregation (EUA).^{*} As a result, BellSouth will disconnect the End User PVC at the End User location starting on Nov 16, 2006. It is important that you notify your BellSouth Account Executive so that they will be aware of your plans and will be preparing to close your DSL account.
2. You have End Users on PVC and you want to convert your PVC to EUA – See Bulletins #299, #300 and #301 and contact your BellSouth Account Executive ***immediately***. There is lots of work still to be done and waiting any longer may jeopardize your connection to your End Users.
3. You have End Users on PVC and you may choose to use the services of an aggregator to help convert your PVC End Users (see Bulletin #302, #306 and #309).
4. You currently purchase EUA, but have not yet converted all of your End Users from PVC to EUA. You **must** complete the conversion of your End Users to EUA by **Nov. 16, 2006**. Remaining PVC End Users will be **disconnected** starting Nov 16, 2006. Please make every effort to have these converted by **Nov. 1, 2006** so that if there are problems encountered, there will be time to solve them.
5. You currently have all your End Users on EUA. For the upcoming deadline, there is nothing else that needs to be done related to PVC End Users. However, you may still require a WBBG^{*} connection to be defined, tested and put into operation.

^{*}End User Aggregation - (also known as BBG) is BellSouth's session based DSL service that uses PPP sessions and L2TP tunneling. BellSouth is, also, gradually deploying WBBG in some, but not all, LATAs within BellSouth. NSPs will need a logical connection to both networks in those LATAs. Bulletins #299 and #300 provide further background to BBG and WBBG.

For more information regarding this bulletin, please contact your BellSouth Sales Representative.

For more information regarding this bulletin, please contact
your BellSouth Sales Representative.



Suspension of PVC DSL Disconnection Deadline

BELLSOUTH DSL BULLETIN #313

Date: October 23, 2006

Subject: Suspension of PVC DSL Disconnection Deadline

PVC Disconnection Deadline Suspended

BellSouth is suspending the previously announced deadline of November 16, 2006 for disconnection of PVC-based DSL services and the related conversion of PVC end users to the BBG/WBBG environment. BellSouth is reassessing the timeline for the discontinuance of its PVC-based DSL service. Until further notice, BellSouth will not disconnect PVC connections in association with the upgrade of its DSL network to BBG/WBBG.

BellSouth will provide NSPs with at least 30 days' notice of any policy or deadline changes regarding PVC services.

FAQs

Question: At this point, what are my options for converting PVC to BBG/WBBG?

1. You can transition your end users from PVC to BBG and establish a WBBG connection.
2. You can work with one of the three Network Service Providers listed below. These NSPs can serve as aggregators of BellSouth's wholesale DSL services for Internet service providers across the 9-state BellSouth region.

MegaPath Networks www.megapath.com http://www.megapath.com/ DSL Aggregator Team Phone: 877-757-5806 Email: sales@megapath.net	Hughes www.Hughesnet.com http://www.hughesnet.com/ Phone: 1-866-240-3875 (Leave a message with name, phone # and question – calls will be returned within 3 days.)	ITO, LLC David Funderburk ITO - Business Development Manager Phone: 770-623-4409 Email: sales@itoconnect.com
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Question: How long do I have to convert my PVC end users to BBG/WBBG now?

BellSouth is reassessing the time frame for conversions and a decision is pending. You will receive at least 30 days' notice before any change in policies or deadlines pertinent to the conversion.

BellSouth still encourages NSPs to convert to the BBG services architecture and establish a WBBG connection. Another option is to use one of the three aggregators above.

Question: Should I continue migrating my PVC end users?

BellSouth recommends that you continue converting end users if you are already in the conversion process.

If you have not begun transitioning end users off PVC, please contact your Account Executive to discuss options for migrating your end users to one of the aggregators listed above or commencing the PVC conversion process.

Related Bulletins: For more details, refer to bulletins 292(WBBG), 299 (Converting PVC to BBG), 300 (Converting PVC to BBG & WBBG), 301 (Converting PVC to BBG & WBBG), 302 (Using an Aggregator), 306 (Using an Aggregator), 309 (Using and Aggregator), 310 (PVC Disconnection).

For more information regarding this bulletin, please contact your BellSouth Sales Representative.

For more information regarding this bulletin, please contact
your BellSouth Sales Representative.



Act Now: PVC DSL to be Discontinued

AT&T DSL BULLETIN #320

Date: February 2, 2007
Subject: PVC DSL Product Discontinued

PVC product will be discontinued May 31, 2007.

This bulletin applies to the AT&T franchise territory in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina and Tennessee (the former BellSouth territory).

Per previously published bulletin 313, dated October 23, 2006, AT&T is providing NSPs notice of its intent to discontinue PVC-based DSL effective 5:00 p.m. EST on May 31, 2007.

All PVC service to end users will be discontinued after 5:00 p.m. EST on May 31, 2007. After that time, PVCs will be disconnected.

See the table below to find out what actions are necessary according to your situation.

End Users on PVC (some or all)	BBG ¹ Connected	WBBG Connected	WBBG Tested	Actions
Yes	No	No	No	<p>If you plan to convert PVC to BBG, do one of the following:</p> <ul style="list-style-type: none"> Read bulletins 299, 300 and 301. Contact your Account Executive immediately to order both the BBG and WBBG connections in each relevant LATA. Begin this process no later than April 15, 2007, to allow time for provisioning and troubleshooting, or testing may not be complete before the May 31, 2007 deadline. Engage an aggregator to help you convert PVC to BBG. Read bulletins 302, 306 and 309 for information about aggregators. Begin this process no later than April 15, 2007, to allow time for provisioning and troubleshooting. <p>OR</p> <p>If you do not plan to convert PVC to BBG: Contact your AT&T Account Executive to close your DSL account. Please disconnect your end users by May 31, 2007. After that date, AT&T reserves the right to disconnect any remaining PVC circuits at any time without further notice.</p>
Yes	Yes	No	No	<p>If possible, convert remaining PVC to BBG by May 1, 2007, to allow time for troubleshooting, if necessary. At the latest, have PVC converted to BBG by May 31, 2007. After that date, AT&T reserves the right to disconnect any remaining PVC circuits at any time without further notice.</p> <p>Establish a WBBG connection. Contact your Account Executive or email WBBGdefine@bellsouth.com; you will be contacted to define the connection and schedule a test. Read bulletin 300 for a description of needed information.</p>
Yes	Yes	Yes	Yes	<p>If possible, convert remaining PVC to BBG by May 1, 2007, to allow time for troubleshooting, if necessary. At the latest, have PVC converted to BBG by May 31, 2007. After that date, AT&T reserves the right to disconnect any remaining PVC circuits at any time without further notice.</p>
No	Yes	No	No	<p>Establish a WBBG connection. Contact your Account Executive or email WBBGdefine@bellsouth.com; you will be contacted to define the connection and schedule a test. Read bulletin 300 for a description of needed information.</p>
No	Yes	Yes	Yes	<p>Relax! No further action is necessary.</p>

¹BBG (Broadband Gateway) is also known as End User Aggregation. It is AT&T's session based DSL service. BBG uses PPP sessions and L2TP tunneling. AT&T is also deploying the Wholesale Broadband Gateway (WBBG) architecture in the AT&T franchise territory in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina and Tennessee (the former BellSouth territory). NSPs will need a logical connection to both networks in those LATAs. Bulletins #299 and #300 provide further background on BBG and WBBG.

For more information regarding this bulletin, please contact your AT&T Sales Representative.

For more information regarding this bulletin, please contact your AT&T Sales Representative.



Act Now: PVC DSL to be Discontinued 5/31/07

DSL BULLETIN #322

Date: March 8, 2007
Subject: PVC DSL Product Discontinued 5/31/07

This bulletin applies to AT&T's Wholesale DSL service in its franchise territory in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina and Tennessee (the former BellSouth territory).

Per previously published bulletins 313, dated October 23, 2006, and 320 dated February 2, 2007, the new AT&T is providing NSPs notice of its intent to discontinue PVC-based DSL effective 5:00 p.m. EST on May 31, 2007.

All PVC service to end users will be discontinued after 5:00 p.m. EST on May 31, 2007. After that time, PVCs will be disconnected.

See the table below to find out what actions are necessary according to your situation.

End Users on PVC (some or all)	BBG [†] Connected	WBBG Connected	WBBG Tested	Actions
Yes	No	No	No	<p>If you plan to convert PVC to BBG, do one of the following:</p> <ul style="list-style-type: none"> Read bulletins 299, 300 and 301. Contact your Account Executive immediately to order both the BBG and WBBG connections in each relevant LATA. Begin this process no later than April 15, 2007, to allow time for provisioning and troubleshooting, or testing may not be complete before the May 31, 2007 deadline. Engage an aggregator to help you convert PVC to BBG. Read bulletins 302, 306 and 309 for information about aggregators. Begin this process no later than April 15, 2007, to allow time for provisioning and troubleshooting. <p>OR</p> <p>If you do not plan to convert PVC to BBG: Contact your AT&T Representative to close your DSL account. Please disconnect your end users by May 31, 2007. After that date, the new AT&T reserves the right to disconnect any remaining PVC circuits at any time without further notice.</p>
Yes	Yes	No	No	<p>If possible, convert remaining PVC to BBG by May 1, 2007, to allow time for troubleshooting, if necessary. At the latest, have PVC converted to BBG by May 31, 2007. After that date, the new AT&T reserves the right to disconnect any remaining PVC circuits at any time without further notice.</p> <p>Establish a WBBG connection. Contact your Account Executive or email WBBGdefine@bellsouth.com; you will be contacted to define the connection and schedule a test. Read bulletin 300 for a description of needed information.</p>
Yes	Yes	Yes	Yes	<p>If possible, convert remaining PVC to BBG by May 1, 2007, to allow time for troubleshooting, if necessary. At the latest, have PVC converted to BBG by May 31, 2007. After that date, the new AT&T reserves the right to disconnect any remaining PVC circuits at any time without further notice.</p>

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Act Now: PVC DSL to be Discontinued 5/31/07

End Users on PVC (some or all)	BBG ¹ Connected	WBBG Connected	WBBG Tested	Actions
No	Yes	No	No	Establish a WBBG connection. Contact your Account Executive or email WBBGdefine@bellsouth.com ; you will be contacted to define the connection and schedule a test. Read bulletin 300 for a description of needed information.
No	Yes	Yes	Yes	Relax! No further action is necessary.

¹BBG (Broadband Gateway) is also known as End User Aggregation. It is the new AT&T's session based DSL service. BBG uses PPP sessions and L2TP tunneling. The new AT&T is also deploying the Wholesale Broadband Gateway (WBBG) architecture in the new AT&T franchise territory in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina and Tennessee (the former BellSouth territory). NSPs will need a logical connection to both networks in those LATAs. Bulletins #299 and #300 provide further background on BBG and WBBG.

For more information regarding this bulletin, please contact your AT&T Representative.

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8 Weeks Remain: PVC DSL Discontinued 5/31/07

DSL BULLETIN #326

Date: April 2, 2007

Subject: PVC DSL Product Discontinued 5/31/07

This bulletin applies to AT&T's Wholesale DSL service in its franchise territory in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina and Tennessee (the former BellSouth territory).

Per previously published bulletins 313, dated October 23, 2006, 320 dated February 2, 2007 and 322 dated March 8, 2007, the new AT&T is providing NSPs notice of its intent to discontinue PVC-based DSL effective 5:00 p.m. EDT on May 31, 2007. On May 31, 2007, less than 9 weeks from the date of this bulletin, all PVC circuits will be disconnected.

All PVC service to end users will be discontinued after 5:00 p.m. EDT on May 31, 2007. After that time, PVCs will be disconnected.

See the table below to find out what actions are necessary according to your situation.

End Users on PVC (some or all)	BBG [†] Connected	WBBG Connected	WBBG Tested	Actions
Yes	No	No	No	If you plan to convert PVC to BBG, do one of the following: <ul style="list-style-type: none">• Read bulletins 299, 300 and 301. Contact your Account Executive immediately to order both the BBG and WBBG connections in each relevant LATA. Begin this process no later than April 15, 2007, to allow time for provisioning and troubleshooting, or testing may not be complete before the May 31, 2007 deadline.• Engage an aggregator to help you convert PVC to BBG. Read bulletins 302, 306 and 309 for information about aggregators. Begin this process no later than April 15, 2007, to allow time for provisioning and troubleshooting. OR If you do not plan to convert PVC to BBG: Contact your AT&T Representative to close your DSL account. Please disconnect your end users by May 31, 2007. After that date, the new AT&T reserves the right to disconnect any remaining PVC circuits at any time without further notice.
Yes	Yes	No	No	If possible, convert remaining PVC to BBG by May 1, 2007, to allow time for troubleshooting, if necessary. At the latest, have PVC converted to BBG by May 31, 2007. After that date, the new AT&T reserves the right to disconnect any remaining PVC circuits at any time without further notice. Establish a WBBG connection. Contact your Account Executive or email WBBGdefine@bellsouth.com ; you will be contacted to define the connection and schedule a test. Read bulletin 300 for a description of needed information.
Yes	Yes	Yes	Yes	If possible, convert remaining PVC to BBG by May 1, 2007, to allow time for troubleshooting, if necessary. At the latest, have PVC converted to BBG by May 31, 2007. After that date, the new AT&T reserves the right to disconnect any remaining PVC circuits at any time without further notice.
No	Yes	No	No	Establish a WBBG connection. Contact your Account Executive or email WBBGdefine@bellsouth.com ; you will be contacted to define the connection and schedule a test. Read bulletin 300 for a description of needed information.
No	Yes	Yes	Yes	Relax! No further action is necessary.

PVC Tariff

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8 Weeks Remain: PVC DSL Discontinued 5/31/07

In connection with the discontinuance of PVC-based DSL, and consistent with the FCC's Wireline Broadband Order, AT&T will be eliminating the language in FCC Tariff No. 1 regarding PVC-based DSL effective June 1, 2007.

¹BBG (Broadband Gateway) is also known as End User Aggregation. It is the new AT&T's session based DSL service. BBG uses PPP sessions and L2TP tunneling. The new AT&T is also deploying the Wholesale Broadband Gateway (WBBG) architecture in the new AT&T franchise territory in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina and Tennessee (the former BellSouth territory). NSPs will need a logical connection to both networks in those LATAs. Bulletins #299 and #300 provide further background on BBG and WBBG.

²Appropriate Framework for Broadband Access to the Internet over Wireline Facilities Universal Service Obligations of Broadband Providers, Report and Order and Notice of Proposed Rulemaking, CC Docket No. 02-33, 20 FCC Rcd ¶ 14853, 101 (2005) (Wireline Broadband Order).

For more information regarding this bulletin, please contact your AT&T Representative.

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